

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Gary D. Reeser aka Gary D. Reeser, Jr. aka  
Gary David Reeser, Jr. aka Gary Reeser  
Debtor(s)**

**BK NO. 18-15841 REF**

**Chapter 13**

**PACIFIC UNION FINANCIAL, LLC  
Movant**

**Related to Document No. 17**

**Hearing Date: 12/20/18**

vs.

**Gary D. Reeser aka Gary D. Reeser, Jr. aka Gary  
David Reeser, Jr. aka Gary Reeser  
Respondent(s)**

**OBJECTION OF PACIFIC UNION FINANCIAL, LLC  
TO CONFIRMATION OF CHAPTER 13 PLAN**

PACIFIC UNION FINANCIAL, LLC (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. On October 19, 2018, Secured Creditor filed a secured proof of claim setting forth pre-petition arrears in the amount of \$42,902.25.
2. Debtor's Plan provides for payment in the amount of \$32,282.00 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$10,620.25, and does not provide sufficient funding to pay said claim including present value interest.
4. In addition, the Debtor's Plan provides for regular monthly payments to Secured Creditor in the \$1,692.00 wherein the required contractual monthly amount is \$1,725.31.
5. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
6. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.
7. Debtor(s) is/are delinquent in plan payments to the Chapter 13 Trustee in the amount of \$700.00.

WHEREFORE, the Secured Creditor, PACIFIC UNION FINANCIAL, LLC, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: December 13, 2018

By: /s/ Kevin G. McDonald  
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